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August 28, 2003

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

By Electronic Submission

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John Muleta
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

David Solomon
Chief, Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D C. 20554

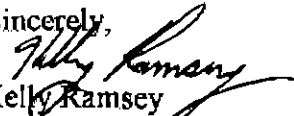
Re: Supplement to E911 Interim Report for Tier III Carriers
CC Docket No. 94-102
Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon

Dear Ms. Dortch.

Litchfield County Cellular, Inc., d/b/a Ramcell of Oregon ("LCC") hereby submits a Supplemental E911 Interim Report for Tier III carriers. LCC timely submitted its initial E911 Interim Report on August 1, 2003. Since that time, it has come to the attention of LCC that information in its Interim Report, as filed, concerning the availability and price of ALI capable handsets needed to be corrected. Accordingly, the attached Supplemental Report provides information that was accurate as of August 1, 2003 and supercedes the Interim Report submitted to the Commission on August 1, 2003.

Please contact the undersigned if you should have any questions regarding this Report.

Sincerely,


Kelly Ramsey
Litchfield County Cellular, Inc.
d/b/a Ramcell of Oregon
(606) 878-6000

044
10/1/03

INTERIM REPORT FOR TIER III CARRIERS

LITCHFIELD COUNTY CELLULAR, INC. D/B/A RAMCELL OF OREGON Block B licensee of Oregon 5 – Coos RSA

Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon (“LCC”) hereby provides the Commission with its Supplemental E911 Interim Report (“Report”) for Tier III Carriers. This Report updates and supercedes the E911 Interim Report filed by LCC on August 1, 2003 and is being filed in order to correct the record to indicate that LCC has obtained and sold ALI-capable GSM handsets.¹

LCC understands the importance of E911 and its obligation as a licensee to assist in ensuring that E911 connectivity for Phase I and Phase II service is properly implemented. LCC is using the services of Telecommunications Service Incorporated (“TSI”) to assist it with its E911 implementation. TSI is a third party vendor with years of experience in assisting wireless carriers, such as LCC, in their E911 implementation efforts by providing both project management and implementation services. TSI has played a key role in LCC’s E911 implementation process, coordinating the implementation process and assisting LCC with technical problems as they arose. TSI, with the participation of the relevant Public Switched Safety Points (“PSAPs”) and Local Exchange Carriers (“LECs”), developed an implementation process by which each party was assigned implementation tasks with mutually agreed upon deadlines. To ensure that the parties were all involved and kept current, TSI hosts bi-weekly conference calls with all the parties to discuss developments and gauge progress.

The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):

LCC has one Phase I PSAP request, dated October 19, 1999, from the Oregon Emergency Management, Department of State Police. This PSAP request was intended, however, to cover all the PSAPs in the State of Oregon. LCC has not received any Phase II requests from any PSAPs within its licensed service area. There are seven (7) PSAPS throughout the OR-5 RSA. The seven PSAPS are: Douglas County Sheriff’s Office; Douglas County, Myrtle Creek Police Department; Coos County Sheriff’s Office, Coos County 9-1-1 Center, Coos Bay Police Department, Josephine County 9-1-1 Center; Curry County Sheriff’s Office, and; Curry County 9-1-1 Center, Brookings Police Department. Of these seven, the following four PSAP centers are the answering points for 9-1-1 calls within their counties: Josephine County 9-1-1 Center, Coos County 9-1-1 Center, Curry County 9-1-1 Communications, and; Douglas County Sheriff’s Office. These four centers will be the answering points for their counties and will transfer calls for the small PSAPs in Brookings (Brookings Police Dept), Coos Bay (Coos Bay Police Dept.) and Myrtle Creek (Myrtle Creek Police Dept).

¹ In preparing the Interim Report, LCC’s recently hired general manager provided errant information, which is being corrected herein. Upon discovering this error, LCC immediately began preparing this filing.

TSI and LCC are working with the PSAPs in LCC's service area to ensure reliable E911 Phase I service. TSI and the PSAPs are conducting regularly scheduled meetings to discuss implementation milestones and the work that needed to be done to achieve these milestones. Specifically, TSI sent out surveys and information requests to the PSAPs and the LEC in order to ascertain the various elements and components of E911 Phase I that LCC would need to implement. This information was deemed essential for LCC to begin implementation efforts and to establish the requisite implementation schedule.

Originally, TSI had requested that the PSAPs return their surveys to TSI by March 18, 2003. With the exception of the Coos Bay Police Department, all the PSAPs returned their surveys in late April 2003. Moreover, TSI requested that the Josephine County 9-1-1 Communications Center PSAP ("Josephine PSAP") and the Douglas County Sheriff's Office PSAP return their updated Master Street Address Guides ("MSAG") by March 2003.² The MSAG is a critical document as it provides information regarding where emergency rescue efforts should be sent. The Josephine PSAP only recently provided its MSAG update on July 3, 2003 and Douglas County Sheriff's Office has yet to respond to this request for information. Continued delays by the PSAPs in returning the requested information have contributed in a significant manner to the delays associated with LCC's ability to provide E911 Phase I service because without this most basic information, such as the number of trunks from the selective router to the PSAP or the location of the ALI database, LCC is unable to proceed with implementation.

Similar surveys were also sent to the two LECs that provide service in the Oregon 5 RSA, Verizon and Qwest. TSI requested that the LECs return their surveys to TSI by December 13, 2002. While Verizon was timely in completing its survey, Qwest did not return all of its information until April 16, 2003. TSI, and thus LCC, cannot plan for E911 Phase I implementation without the "complete picture." Delays on one end have led to further delays in the process.

Additionally, delays in LCC's ability to respond to the Phase I requests also stem from the delays associated with LCC's negotiations for its interconnection agreements with Verizon and Qwest. All parties have been vigorously working towards completing these Agreements and it is anticipated that they will be completed in the immediate future. Once these Agreements are finalized, LCC will be able to order the necessary circuits it will need for E911 Phase I implementation. In anticipation that all continues to go well, LCC believes that it will be ready to go to live users before the end of the year.

There is one other factor contributing to LCC's inability to currently meet the E911 Phase I requests – funding. In order to be able to provide E911 Phase I service through its switch, LCC will need to purchase and install two new features to its Lucent 5E switch – FAF 343 and 464. The cost of acquiring these two features is \$236,000 – a significant expense for a small rural carrier. LCC has worked tirelessly these past two

² The remaining five PSAPs are located in territory served by Verizon. Verizon and LCC are in the final stages of negotiating a 911 addendum to their Interconnection Agreement. Once this Addendum is finalized, TSI will send Verizon the MSAG update requests covering the PSAPs in Verizon's area.

years in trying to “keep up” with all the Commission’s regulatory mandates for wireless carriers LNP, TTY, CALEA as well as E911. Each of these mandated programs has required LCC to upgrade of an existing component of LCC’s switch or a purchase new components which would otherwise would either not have been purchased or would not have been purchased for quite some time. And each one comes at a price – a price that is sometimes too high for small carriers to absorb. LCC was recently compelled to request an extension of an underlying waiver request of the Commission’s requirement to support roaming of pooled and ported numbers because it has been unable to obtain the necessary financing to fund the needed upgrades.³ While LCC anticipates that this funding will be finalized by the end of August, LCC will have to find additional funds to meet E911 mandates.

TSI has kept all seven PSAPs up to date on the status of LCC’s efforts through TSI’s bi-weekly conference calls. Through these efforts a cooperative partnership between the PSAPs and Ramcell has been forged. The PSAPs are comfortable with the progress made by LCC and have continued to provide LCC with the needed flexibility to meet their Phase I requests.⁴ LCC will continue to work closely with the LECs to work towards the provision of E911 Phase I service. In anticipation that all continues to go well, LCC believes that it will be ready to go to live users before the end of the year.

The carrier’s specific technology choice (i.e., network-based or handset-based solutions, as well as the type of technology used):

As previously reported to the Commission, LCC will be utilizing a handset-based location technology solution for Phase II E911. LCC has begun this effort by ordering, receiving and selling GSM ALI capable handsets. LCC has sold ALI-capable handsets and thus has met the September 1, 2003 deadline.

Status on ordering and/or installing necessary network equipment.

As LCC has not received any requests for Phase II E911 service, it has not begun to order the network equipment that will be needed to implement Phase II E911 service. As outlined above, LCC is working towards completion of its interconnection agreements with the Verizon and Qwest and upon obtaining the necessary financing for the needed switch components. Once these tasks are completed, LCC will be close to successfully implementing Phase I E911 service throughout its service area. LCC anticipates completing this implementation by the end of the year. TSI and LCC will turn to implementation of E911 Phase II service upon completion of Phase I service. LCC will begin working on its Phase II E911 implementation with TSI despite there being no E911 Phase II service request from any of the PSAPs covering its area.

³ See Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon, Progress Report for Petition for Limited Waiver and Extension of Time, CC Docket 99-200 (June 13, 2003).

⁴ The FCC’s rules as well as a recent FCC decision make it clear that the PSAPs and the carrier may jointly agree to alternate timeframes than those delineated in the FCC’s rules. See, 47 C.F.R. § 20.18(j)(5). See also, *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Petition of City of Richardson, Texas, CC Docket No. 94-102, *Order on Reconsideration*, 17 FCC Red 24282, 24282 (2002).

LCC currently anticipates two possible problems in ordering and installing the necessary equipment. The first one is endemic to all Tier III carrier, whether the requisite equipment will be in sufficient supply. Because there is such a large demand for the necessary equipment to become Phase II compliant, small Tier III carriers such as LCC are forced to wait until there is enough supply for it to receive the needed equipment. The second issue is the question of whether LCC will have sufficient capital to purchase the equipment. As there are no Phase II requests and LCC does not foresee such a request in the near future, LCC cannot judge at this time whether either or both of these issues will prove to be significant.

If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets:

As noted above, LCC is pursuing a handset-based solution for its GSM system. LCC has been able to order, procure and sell ALI-capable GSM handsets whereas LCC has not been able to do so for its TDMA systems licensed to KY6 and KY11.⁵ LCC has been able to motivate its subscribers to purchase ALI-capable handsets by featuring them prominently in its handset line and by minimizing the number of non-ALI handsets offered. LCC believes that this effort is aided by the fact that it has been able to obtain GSM ALI capable handsets which are only marginally more expensive than their non-ALI-capable counterparts.

The estimated date on which Phase II service will first be available in the carrier's network:

Without a valid PSAP request for E911 Phase II service, it is difficult for LCC to estimate when such service will be available. Should a PSAP request such service in the near future, however, LCC believes that it will be capable of responding to such a request within the FCC allocated six-month period.

Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005.

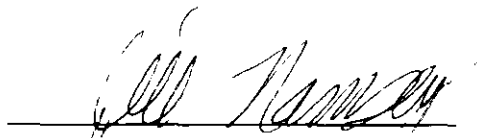
LCC believes that the December 31, 2005 deadline for a 95% penetration rate by ALI-capable handsets is attainable as long as ALI-based handsets remain available at a wholesale price that is not significantly higher than the wholesale cost of similar non-ALI-capable handsets. LCC will provide the Commission with additional updates if any hurdles appear which could endanger its ability to meet the benchmark deadlines.

⁵ See Litchfield County Cellular, Inc.'s (licensee of KY11) Interim Report for Tier III Carriers filed August 1, 2003.

DECLARATION OF JILL RAMSEY

I, Jill Ramsey, am an officer of Litchfield County Cellular, Inc., d/b/a Ramcell of Oregon and I hereby certify that, to the best of my knowledge and belief, the information contained on the attached document is complete and accurate.

Signed: _____



Date _____

